

HONORABLE ROBERT J. BRYAN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

KING COUNTY, WASHINGTON; DOW
CONSTANTINE, in his official capacity as
King County Executive,

Defendants.

Case No. 2:20-cv-203 RJB

DECLARATION OF SHANE P. CRAMER IN
SUPPORT OF DEFENDANTS' RESPONSE TO
PLAINTIFF'S MOTION FOR JUDGMENT ON
THE PLEADINGS/SUMMARY JUDGMENT
AND CROSS-MOTION FOR SUMMARY
JUDGMENT

NOTED ON MOTION CALENDAR:
FEBRUARY 15, 2023

I, Shane P. Cramer, declare as follows:

1. I am one of the attorneys representing defendants King County and Dow
Constantine (the County), in the above-captioned action, am over age 18, and competent to be a
witness. I am making this declaration based on facts within my own personal knowledge.

2. Attached as Exhibit 1 is a true and correct copy of the King County webpage,
<https://kingcounty.gov/services/airport.aspx>. This document was collected from the internet on
January 10, 2023.

3. Attached as Exhibit 2 is a true and correct copy of an excerpt of deposition

DECLARATION OF SHANE P. CRAMER IN SUPPORT OF
DEFENDANTS' RESPONSE TO PLAINTIFF'S MOTION FOR
JUDGMENT ON THE PLEADINGS/SUMMARY JUDGMENT AND
CROSS-MOTION FOR SUMMARY JUDGMENT - 1
(Case No. 2:20-cv-203 RJB)

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1 testimony from the deposition of John Parrott, King County's Rule 30(b)(6) designee, taken on
2 November 9, 2022. Mr. Parrott is the Director of the King County International Airport.

3 4. Attached as Exhibit 3 is a true and correct copy of the King County webpage,
4 <https://kingcounty.gov/services/airport/about.aspx>. This document was collected from the internet
5 on January 10, 2023.

6 5. Attached as Exhibit 4 is a true and correct copy of an excerpt of deposition
7 testimony from the deposition of Mark Carmen, Modern Aviation's Rule 30(b)(6) designee, taken
8 on August 22, 2022. Mr. Carmen is President and CEO of Modern Aviation.

9 6. Attached as Exhibit 5 is a true and correct copy of an excerpt of the deposition
10 testimony from the deposition of Bryan Wilcox, taken on October 6, 2022. Mr. Wilcox was
11 formerly the Deputy Field Office Director, Enforcement and Removal Operations for ICE, in
12 Seattle.

13 7. Attached as Exhibit 6 is a true and correct copy of a Seattle Times article published
14 on January 28, 2019, entitled "How Saturday's protest against Trump's refugee ban unfolded at
15 Sea-Tac." This article was collected from this website: [https://www.seattletimes.com/seattle-](https://www.seattletimes.com/seattle-news/how-the-protest-against-trumps-refugee-ban-at-sea-tac-unfolded/)
16 [news/how-the-protest-against-trumps-refugee-ban-at-sea-tac-unfolded/](https://www.seattletimes.com/seattle-news/how-the-protest-against-trumps-refugee-ban-at-sea-tac-unfolded/), on January 10, 2023.

17 8. Attached as Exhibit 7 is a true and correct copy of a Seattle Times article published
18 on July 2, 2018, entitled "10,000 demonstrate in SeaTac against Trump's 'zero tolerance'
19 immigration policy." This article was collected from this website:
20 [https://www.seattletimes.com/seattle-news/politics/10000-strong-demonstrate-at-seatac-detention-](https://www.seattletimes.com/seattle-news/politics/10000-strong-demonstrate-at-seatac-detention-facility-against-president-trumps-zero-tolerance-immigration-policy/)
21 [facility-against-president-trumps-zero-tolerance-immigration-policy/](https://www.seattletimes.com/seattle-news/politics/10000-strong-demonstrate-at-seatac-detention-facility-against-president-trumps-zero-tolerance-immigration-policy/), on January 10, 2023.

22 9. Attached as Exhibit 8 is a true and correct copy of an excerpt of the deposition
23 testimony from the deposition of Robert Cordero, Plaintiff's Rule 30(b)(6) designee, taken on
24 November 17, 2022. Mr. Cordero is the ICE Air Operations Unit Chief.
25

1 10. Attached as Exhibit 9 is a true and correct copy of an April 16, 2019 email (with
2 attachments) from Angelina Snodgrass Godoy, the Director of the University of Washington
3 Center for Human Rights, to County employees Bookda Gheisar, Gina Topp, and Dylan Ordonez,
4 with the subject “as promised,” and which was produced in this matter under Bates number
5 KC_003299-KC_003337.

6 11. Attached as Exhibit 10 is a true and correct copy of a My Northwest article,
7 published on May 1, 2019, entitled, “May Day 2019: What to expect, avoid, and look out for
8 today.” This document was collected from this website: [https://mynorthwest.com/1360846/seattle-](https://mynorthwest.com/1360846/seattle-prepares-may-day-2019/)
9 [prepares-may-day-2019/](https://mynorthwest.com/1360846/seattle-prepares-may-day-2019/), on January 10, 2023.

10 12. Attached as Exhibit 11 is a true and correct copy of an excerpt of deposition
11 testimony from the deposition of Dr. Daniel Carson, Classic Air Charter’s Rule 30(b)(6) designee,
12 taken on October 12, 2022. Dr. Carson is the CEO of Classic Air Charters.

13 13. Attached as Exhibit 12 is a true and correct copy of a February 4, 2020 email from
14 Bryan Wilcox to another ICE employee, Natalie Asher, with the subject “PDX one-pager,” which
15 was marked as Exhibit 29 to the deposition of Mr. Wilcox in this matter, and which is Bates
16 numbered ICE_0003470-ICE_0003472.

17 14. Attached as Exhibit 13 is a true and correct copy of King County Executive Order
18 No. PFC-7-1-EO, which was marked as Exhibit 6 to the deposition of Mark Carmen in this matter,
19 and which is Bates numbered MODERN_0075-0077.

20 15. Attached as Exhibit 14 is a true and correct copy of an excerpt of Plaintiff’s
21 Objections and Responses to Defendant King County’s First Set of Discovery Requests, dated
22 April 29, 2020.

23 16. Attached as Exhibit 15 is a true and correct copy of a July 12, 2019 letter from Dr.
24 Carson to Benjamin Shih, ICE Office of Acquisition Management, with the subject, “King County
25

Executive Order (70CDCR18FR0000002),” which was marked as Exhibit 51 to the deposition of Dr. Carson in this matter, and which bears Bates number Classic-07-20-2022_000001-000002.

17. Attached as Exhibit 16 is a true and correct copy of an excerpt of Plaintiff’s Supplement Objections and Responses to Defendant King County’s First Set of Discovery Requests, dated July 26, 2022.

18. Attached as Exhibit 17 is a true and correct copy of a King County webpage, <https://kingcounty.gov/about/policies/masterlist.aspx>. This document was collected from the internet on January 11, 2023.

19. Attached as Exhibit 18 is a true and correct copy of the Instrument of Transfer, dated May 26, 1948, which was marked as Exhibit 65 to the deposition of John Parrott in this matter.

20. Attached as Exhibit 19 is a true and correct copy of an excerpt of Plaintiff’s Objections and Response to Defendant King County’s Second Set of Discovery Requests, dated September 11, 2020.

21. Attached as Exhibit 20 is a true and correct copy of a collection of King County International Airport invoices to Swift Air LLC for the payment of landing fees related to immigration flights, which are dated August 28, 2018, September 21, 2018, October 26, 2018, and December 21, 2018, and which were produced in this matter under Bates numbers KC_003465-003472.

I swear under penalty of perjury under the laws of the United States that the foregoing is true and correct.

DATED this 11th day of January, 2023, at Seattle, Washington.

s/ Shane P. Cramer
SHANE P. CRAMER